

*Phillips v. Collin Cnty. Cmty. Coll. Dist., et al.*

**Exhibit H:**  
**Deposition of Kristen Streater**

Kristen Streater, PH.D.

February 15, 2023

THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS, )  
 )  
Plaintiff, )  
 )  
VS ) CIVIL ACTION NO.  
 ) 4:22-cv-184-ALM  
COLLIN COUNTY COMMUNITY )  
COLLEGE DISTRICT, et al., )  
 )  
Defendants. )

\*\*\*\*\*

VIDEOTAPED DEPOSITION OF  
KRISTEN STREATER, PH.D.  
FEBRUARY 15, 2023

\*\*\*\*\*

VIDEOTAPED DEPOSITION OF KRISTEN STREATER,  
PH.D. produced as a witness at the instance of  
the Plaintiff, and duly sworn, was taken in the  
above-styled and numbered cause on the 15th of  
February, 2023, from 2:57 to 6:47, before Susan  
S. Klinger, RMR-CRR, CSR in and for the State  
of Texas, reported by stenographic method, at  
Abernathy Roeder Boyd & Hullett, PC, 1700 N.  
Redbud Boulevard, Suite 300, McKinney, Texas  
pursuant to the Federal Rules of Civil  
Procedure and the provisions stated on the  
record or attached hereto.

Job No. 916122

A P P E A R A N C E S

Attorneys or the Plaintiff(s):

Greg Harold Greubel, Esquire

Joshua T. Bleisch, Esquire

FOUNDATION FOR INDIVIDUAL RIGHTS AND

EXPRESSION

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P R O C E E D I N G S

VIDEOGRAPHER: Good afternoon, we are now on record. This begins videotape number 1 in the deposition of Kristen Streater in the matter of Joseph Michael Phillips versus Collin County Community College District, et al.

Today's date is February 15th, 2023 and the time is 2:57.

Will the court reporter please swear in the witness.

KRISTEN STREATER, PH.D.,  
having been first duly sworn testified as follows:

EXAMINATION

BY MR. BLEISCH:

Q. Good afternoon.

A. Hi.

Q. My name is Josh Bleisch. I will be taking your deposition today. Before we get started on the questions about this case, I have a few introductory points and questions I would like to ask you.

A. Okay.

Q. Would you please state your name and

1 yourself. Give me -- you know, where did you  
2 go to college?

3 A. I went and got my bachelor's degree  
4 in history from Austin College. I got my  
5 master's degree in history from Louisiana Tech  
6 University, and I got my Ph.D. in history from  
7 the University of Kentucky.

8 Q. When did you earn that Ph.D.?

9 A. The fall of 2001.

10 Q. Do you have any other relevant  
11 training to your current role?

12 A. Do I have -- could you -- I don't  
13 understand do I have relevant training.  
14 I've -- I have been an associate dean and am  
15 now a dean, so those are my administrative  
16 trainings.

17 Q. Sure. Okay. Yeah, well, let's --  
18 let's talk about that.

19 What is your -- you said your  
20 current role is dean?

21 A. I'm currently Dean of Academic  
22 Affairs --

23 Q. Okay.

24 A. -- at the Plano campus.

25 Q. How long have you held that role?

1           A.       I started in that role January the  
2       1st of 2021.

3           Q.       Who is your supervisor in that role?

4           A.       My supervisor is Dr. Mary  
5       Barnes-Tilley, who is provost of the Plano  
6       campus.

7           Q.       What position did you have before  
8       you were dean?

9           A.       Before I was dean, I was associate  
10       dean and I supervised history, government and  
11       psychology.

12          Q.       How long did you have that role?

13          A.       I began that role in July of 2018  
14       and served until I was appointed or was  
15       promoted to the dean position.

16          Q.       What was your role before that?

17          A.       I was a full-time faculty member at  
18       the Plano campus in the history department.

19          Q.       How long did you have that role?

20          A.       That role I was hired in the fall of  
21       2015.

22          Q.       What was your job before that?

23          A.       I had served as an adjunct faculty  
24       member in the history department for Collin  
25       College beginning in the fall of 2006, I

Kristen Streater, PH.D.

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1 Q. Do you remember anything else about  
2 when you first met Dr. Phillips?

3 A. Only that he was a full-time faculty  
4 member of the history department at the Plano  
5 campus.

6 Q. What was your impression of him at  
7 that time?

8 A. I don't recall, he was a colleague.

9 Q. Did you have a professional  
10 relationship?

11 A. With Dr. Phillips, only as a  
12 colleague in the history department.

13 Q. When did Dr. Phillips first come  
14 under your umbrella as a -- as a manager?

15 A. When I became an associate dean in  
16 July of 2018.

17 Q. What was your relationship with  
18 Dr. Phillips like at that time?

19 A. I would have considered it positive,  
20 collegial.

21 Q. Did Dr. Phillips cause you any  
22 issues at that time?

23 A. When I was first hired?

24 Q. Yes.

25 A. In July of 2018, no.

1 Q. Did you know that Dr. Phillips was  
2 not speaking to the reporter about the El Paso  
3 shooting?

4 MR. CRAWFORD: Objection, form.

5 A. Would you repeat the question?

6 Q. Did you know that Dr. Phillips was  
7 not speaking to the reporter about the El Paso  
8 shooting?

9 A. When he conducted the interview, I  
10 was not present at the interview, so no.

11 Q. Is the issue of race relations in  
12 the Dallas/Fort Worth area a matter of public  
13 concern?

14 MR. CRAWFORD: Objection, form.

15 A. Would you repeat the question?

16 Q. Is race relations in the Dallas/Fort  
17 Worth area a matter of public concern?

18 MR. CRAWFORD: Objection, form.

19 A. Today?

20 Q. Yes.

21 A. Yes.

22 Q. Was it a matter of public concern in  
23 2019?

24 MR. CRAWFORD: Objection, form.

25 A. Yes.



1 Q. Did you have any issues with  
2 Dr. Phillips prior to issuing him this employee  
3 coaching form?

4 A. Not to my knowledge, no. Not to my  
5 recollection, no.

6 Q. Did you know that Dr. Phillips told  
7 the Post reporter that he was not speaking as a  
8 professor of the college?

9 A. When I first approached Dr. Phillips  
10 asking about this, he stated that to me.

11 Q. Did you believe him?

12 A. Yes.

13 Q. Did you know that he asked not to be  
14 identified as a professor at the college?

15 A. That is what he stated to me.

16 Q. Did you believe him about that, too?

17 A. Yes.

18 Q. But you decided to go forward with  
19 the coaching form?

20 A. Yes.

21 Q. Did he violate any policy other than  
22 the Dr. Matkin directive when he gave this  
23 interview?

24 A. Not to my knowledge.

25 Q. Now handing you what I've marked as

1           A.       This is my response, my first -- to  
2       the first set of interrogatories.

3           Q.       I will give you an opportunity to  
4       read through it if you like, but I will let you  
5       know I'm only going to be asking you about  
6       Interrogatory Number 7.

7           A.       (Reviewing document.) Okay.

8           Q.       What does it mean to seek revision  
9       in a judicious and appropriate manner?

10          A.       To do something in a judicious  
11       manner means that you are trying to -- you are  
12       not reacting immediately. You are responding  
13       in a thoughtful way. An appropriate manner  
14       would be to seek revision through the processes  
15       and procedures within the college.

16          Q.       Could you explain that a little bit  
17       more for me?

18          A.       The processes and procedures within  
19       the college?

20          Q.       Just putting it all together to, you  
21       know, seek revision in that appropriate manner?

22          A.       To seek revision in an appropriate  
23       manner is to -- according to board policy, I  
24       think it is DGC local, states that if you -- if  
25       a faculty staff have a concern or disagreement

1 or something with a policy or procedure, that  
2 they are to follow -- they are to either ask  
3 their supervisor or they are to follow the  
4 standing committee structure to seek revision  
5 to seek -- to raise the concerns and to see if  
6 it can be changed.

7 Q. Are employees expected to go through  
8 those processes for any concern they have?

9 A. That would be appropriate, yes.

10 Q. Even if their concern is about a  
11 matter of public concern?

12 A. If that matter of public concern --  
13 yes.

14 Q. So that was a yes?

15 A. Yes.

16 Q. What happens if they failed to use  
17 those processes that you mentioned and instead  
18 bring their concerns elsewhere?

19 A. What happens if they bring their  
20 concerns elsewhere? They are within their  
21 rights to do so. They are within their rights  
22 to do so.

23 Q. Can the college discipline them for  
24 it?

25 A. If -- faculty have the right to

1 if they're Dr. Barnes-Tilley's notes?

2 A. They're Dr. Barnes-Tilley's notes.

3 Q. Were you a part of this meeting?

4 A. Yes.

5 Q. What was the meeting about?

6 A. The meeting was about

7 Dr. Barnes-Tilley and my concerns about

8 Facebook posts that Dr. Phillips had been

9 posting related to the college's response to --

10 to COVID.

11 Q. What were your concerns?

12 A. That some of the information that  
13 was on the post was not accurate and  
14 particularly concerning was the first comment  
15 here, that feeling when your employer is  
16 basically saying the loss of your life is an  
17 acceptable calculated risk. That bothered us,  
18 because it suggests that the college did not  
19 care about individual lives.

20 Q. You thought it made the college look  
21 bad?

22 MR. CRAWFORD: Objection, form.

23 A. I thought that it suggested that the  
24 college did not care about individual lives.

25 Q. How did you see these Facebook

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1 Q. Yes.

2 A. Yes.

3 Q. More than three times a month?

4 A. At times, yes.

5 Q. Was Dr. Barnes-Tilley also visiting  
6 his social media pages?

7 A. I don't know.

8 Q. Did you talk to Dr. Barnes-Tilley  
9 about Dr. Phillips' social media?

10 A. Yes.

11 Q. What did you guys talk about?

12 A. Our frustration that he was raising  
13 these concerns in a public way but not bringing  
14 them to us so that we could help get his  
15 questions answered, help him alleviate his  
16 frustration, provide him with other additional  
17 information to help ease what he was worried  
18 about.

19 Q. Were you frustrated by any of the  
20 things that he was saying?

21 A. Yes.

22 Q. What about that frustrated you?

23 A. Again, that he was not -- if he had  
24 these concerns, I was frustrated that he didn't  
25 bring them to me as his associate dean if --

1 your attention?

2 A. I don't recall.

3 Q. Was it Dr. O'Quin?

4 A. I honestly do not recall.

5 Q. Do you know if Dr. Barnes-Tilley  
6 brought it to your attention in this  
7 conversation on August 12th, whether it was the  
8 first time it was brought to your attention or  
9 not?

10 A. I'm sorry, can you repeat the  
11 question?

12 Q. Yes. On this conversation with  
13 Dr. Barnes-Tilley on August 12th, do you know  
14 if she brought this post to your attention  
15 during that conversation?

16 A. I would have to believe so.

17 Q. What is meant here by "formal  
18 coaching" in 2019?

19 A. I'm sorry, on the discipline form?

20 Q. On the discipline form, yes?

21 A. That refers to the coaching form  
22 related to the Washington Post.

23 Q. And what was meant by "informal  
24 coaching" in 2020?

25 A. That refers to the Zoom conversation

1 that Dr. Barnes-Tilley and I had with  
2 Dr. Phillips.

3 Q. What role did these previous  
4 incidents play in your's and Dr. O'Quin's  
5 decision to issue the discipline form here?

6 A. They demonstrated a pattern of  
7 behavior.

8 Q. What kind of behavior?

9 A. That Dr. Phillips did not  
10 question -- did not bring questions about a  
11 directive, about COVID protocols, about things  
12 related to college policy and procedure and  
13 directives that he disagreed with. He didn't  
14 ever ask for clarification. He didn't ever ask  
15 for additional information. He didn't ever ask  
16 any questions about it, and so this is to  
17 outline that pattern of behavior.

18 Q. And the problem was that he took  
19 those elsewhere?

20 MR. CRAWFORD: Objection, form.

21 A. The problem was that he did not  
22 bring those concerns to us.

23 MR. BLEISCH: Should we take a short  
24 break?

25 MR. CRAWFORD: Sure.

1 recommend him for the multiyear contract?

2 A. May I read the -- (Reviewing  
3 document.)

4 So your question was why did I not  
5 recommend him for a multiyear contract?

6 Q. Yes.

7 A. As I've stated in the explanation,  
8 there was a pattern of behavior on the part of  
9 Dr. Phillips that made me pause about his level  
10 of professionalism. And by that I mean he  
11 continued to, despite repeated asks, despite  
12 multiple efforts to get him to bring things to  
13 our attention, to bring them to me, instead of  
14 -- so that I could help him.

15 Instead, come to me, I'm the one  
16 that knows him the longest. I'm the one that  
17 was a colleague and -- and was his associate  
18 dean and -- and now his dean. And I didn't  
19 understand why it is he didn't come to me for  
20 that. And it was despite repeated asks,  
21 despite repeated offerings, despite repeated --  
22 he didn't trust me, and -- or give me the  
23 opportunity directly to help him. And that  
24 pattern of behavior led me to the non-renewal  
25 of a multiyear contract.



1           A.       It is the timeline in the process  
2       that I've been given. I don't -- it is a  
3       challenge.

4           Q.       Did you feel hurt by Dr. Phillips'  
5       willingness to take his concerns to social  
6       media versus to you?

7           A.       I was disappointed.

8           Q.       And that disappointment is what led  
9       you to not recommend him for renewal?

10          A.       No, I didn't recommend him for  
11       renewal because of the pattern of behavior.

12          Q.       Did it matter to you that the  
13       concerns that he shared publicly were about  
14       matters of public concern?

15               MR. CRAWFORD: Objection, form.

16          A.       I'm sorry, repeat the question?

17               MR. BLEISCH: Can you read it back?

18                       (Record read.)

19               MR. CRAWFORD: Objection, form.

20          A.       Did it matter to me that they were  
21       matters of public concern, no.

22               MR. BLEISCH: Can we take a break?

23               MR. CRAWFORD: Sure.

24               VIDEOGRAPHER: We're off record at

25       6:39.

1 (Recess, 6:39 to 6:46 p.m.)

2 VIDEOGRAPHER: We're back on record

3 at 6:46 p.m.

4 Q. Was the pattern of Dr. Phillips  
5 taking his concerns elsewhere that you were  
6 discussing earlier in reference to his posting  
7 on social media?

8 A. Yes.

9 Q. Do you plan to testify at trial in  
10 this case?

11 A. I don't -- I don't know. That is at  
12 the -- my attorneys.

13 Q. If called will your testimony then  
14 be the same as it is today?

15 A. Yes.

16 MR. BLEISCH: I'm done.

17 MR. CRAWFORD: We will reserve our  
18 questions, request the ability to read and  
19 sign.

20 MR. McSHANE: Same for the Board.

21 VIDEOGRAPHER: We're off record at  
22 6:47 p.m.

23 (Deposition concluded at 6:47 p.m.)

24

25



**From:** Michael Phillips  
**Sent:** Monday, September 9, 2019 1:40 PM  
**To:** Kristen L. Streater  
**Subject:** Re: Form  
**Attachments:** Coaching\_Form Michael Phillips Fall 2019 (Michael Phillips).docx

Kristen,

Here's the form with my response. Thank you.

Michael

---

**From:** Kristen L. Streater <kstreater@collin.edu>  
**Sent:** Monday, September 9, 2019 12:49 PM  
**To:** Michael Phillips <mphilips@collin.edu>  
**Subject:** Form

Attached

Dr. Kristen L. Streater  
Associate Dean, Academic Affairs – HIST, GOVT, PSYC  
Collin College - Plano Campus J112  
2800 E. Spring Creek Parkway  
Plano, TX 75074  
972-881-5142



## EMPLOYEE COACHING FORM

### Employee Information

<b>Employee Name:</b>	Joseph Michael Phillips	<b>CWID:</b>	110793529
<b>Immediate Supervisor:</b>	Kristen Streater	<b>Department:</b>	History
<b>Full-time or Part-time:</b>	Full-time	<b>Date:</b>	9/3/19

### Performance Feedback

☒ Constructive Feedback

### Details

**Constructive Feedback:** Be specific, describing the job responsibilities or behavior that needs to change and how the employee needs to change to meet expectations. (Note: Employee Coaching is not considered a level of formal discipline. However, an employee's failure to meet and sustain acceptable performance or behavior may result in formal disciplinary action in the future.)

Following the El Paso shooting on August 3, 2019, Collin College President Dr. Neil Matkin issued a directive to the college community on August 4, 2019, which read in part, "Please refer all press inquiries you may receive to Marisela Cadena-Smith at [MCSmith@collin.edu](mailto:MCSmith@collin.edu) or by phone to the president's office (972-758-3800)."

On August 10, 2019, the Washington Post published an article in which Professor Michael Phillips was cited. This went against the directive by Dr. Matkin.

On August 14, 2019, Associate Dean Kristen Streater talked with Professor Phillips about the Washington Post article, and he admitted to talking with the Post for the article. Although he tried to make it clear to the Post that he was only doing so as a subject expert, and not as a Collin College employee, Associate Dean Streater stated that despite his intentions, the Post was probably going to note that Professor Phillips was a member of the Collin faculty (which they did), and that this violated the President's directive.

Expectations moving forward are to follow the President's directives when approached by the media.

Immediate Supervisor's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

### Acknowledgement of Receipt of Feedback

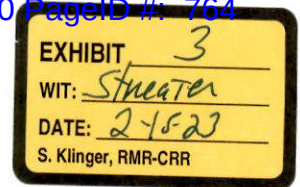
**Employee Comments:**

I noted to Dr. Kristen Streater that when I spoke to the Washington Post reporter I was called not as a member of the Collin College faculty but as an acknowledged expert on race relations in the Dallas-Fort Worth area. I believed that I followed Dr. Matkin's instructions because I did not speak to the Post about the shooter himself or the shooting but about the D-FW area's history of racism. I was asked about racist fliers at the campus and my comments were the same Dr. Matkin made at All-College Day – that the fliers were removed so quickly almost no one knew about them. I also noted that the college was a diverse, tolerant place. I did not believe the interview violated policy as I understood it at the time.

Employee Signature: \_\_\_\_\_

Date: \_\_\_\_\_





**From:** Kristen L. Streater  
**Sent:** Wednesday, August 14, 2019 3:57 PM  
**To:** Mary Barnes-Tilley  
**Subject:** FW: Follow up to our discussion

Just received.

Dr. Kristen L. Streater  
 Interim Associate Dean, Academic Affairs – HIST, GOVT, PSYC  
 Collin College - Plano Campus J112  
 2800 E. Spring Creek Parkway  
 Plano, TX 75074  
 972-881-5142

---

**From:** Michael Phillips  
**Sent:** Wednesday, August 14, 2019 3:52 PM  
**To:** Kristen L. Streater <kstreater@collin.edu>  
**Subject:** Re: Follow up to our discussion

Kristen,

Thank you and I appreciated our conversation. I just wanted to I want to clarify a few things from my perspective.

The Washington Post reporter contacted me via email. On the phone, she made clear that she was aware of my scholarship on race in Dallas. She said she wanted to talk to me about the broader Dallas-Fort Worth historical context of the event, not about the alleged shooter, his time at Collin College, nor the shooting in El Paso itself. I did not discuss any of those topics with her. I asked the reporter to not identify me as a member of the Collin faculty, but as an author and a scholar on race relations. She did not comply with my request.

My interpretation of the email sent by Dr. Matkin was that we were not supposed to talk about the shooting itself or the student. I did not interpret that to mean that I could not respond to questions pertaining to my area of expertise. I did not believe that my comments were in violation of that directive but I now understand that this view is not shared by the administration and I will according to my understanding based on today's conversation.

Upon reflection, however, I am concerned that the response to the Washington Post story has a chilling effect on the faculty's free speech and is anomalous at institutions of higher learning. My concerns aside, I will follow the directive I have been given. Thank you again for your courtesy. I appreciate the job you have done as an associate dean and I am glad that this appointment has been made permanent.

Michael



---

**From:** Kristen L. Streater <[kstreater@collin.edu](mailto:kstreater@collin.edu)>  
**Sent:** Wednesday, August 14, 2019 1:30 PM  
**To:** Michael Phillips <[mphillips@collin.edu](mailto:mphillips@collin.edu)>  
**Subject:** Follow up to our discussion

Michael,

Just a quick follow up to our conversation earlier. Going forward, if any member of the media contacts you about an event or incident related to the college, you are to direct them to contact the Collin College Public Relations Office and the President's Office. Regarding the current incident, you should have followed President Matkin's email directive (email from President Matkin dated 8/4/19 at 4:44pm).

I will be briefing Dr. Barnes-Tilley about our conversation this afternoon.

Please let me know if you have any questions.

Thanks,

Dr. Kristen L. Streater  
Interim Associate Dean, Academic Affairs – HIST, GOVT, PSYC  
Collin College - Plano Campus J112  
2800 E. Spring Creek Parkway  
Plano, TX 75074  
972-881-5142

Kristen Streater, PH.D.

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THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

JOSEPH MICHAEL PHILLIPS, )  
Plaintiff, )  
VS ) CIVIL ACTION NO.  
COLLIN COUNTY COMMUNITY ) 4:22-cv-184-ALM  
COLLEGE DISTRICT, et al., )  
Defendants. )

REPORTER'S CERTIFICATION

DEPOSITION OF KRISTEN STREATER, PH.D.

February 15, 2023

I, Susan S. Klinger, Certified Shorthand  
Reporter in and for the State of Texas, hereby  
certify to the following:

That the witness, KRISTEN STREATER, PH.D.,  
was duly sworn by the officer and that the  
transcript of the oral deposition is a true  
record of the testimony given by the witness;

That the deposition transcript was  
submitted on 2-28, 2023 to the  
witness or to the attorney for the witness for  
examination, signature and return to me by



Kristen Streater, PH.D.

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1 3-31, 2023;

2 That the amount of time used by each party  
3 at the deposition is as follows:

4 Mr. Bleisch: 3:12

5 That pursuant to information given to the  
6 deposition officer at the time said testimony  
7 was taken, the following includes counsel for  
8 all parties of record:

9 Mr. Bleisch, Attorney for Plaintiff(s)

10 Mr. Crawford, Attorney for Defendant(s)

11 Mr. J. Bailey McShane, IV, Attorney for  
12 Defendants

13 I further certify that I am neither  
14 counsel for, related to, nor employed by any of  
15 the parties or attorneys in the action in which  
16 this proceeding was taken, and further that I  
17 am not financially or otherwise interested in  
18 the outcome of the action.

19 Certified to by me this 26th day of  
20 February, 2023.

21 

22 \_\_\_\_\_  
23 Susan S. Klinger,  
24 Texas CSR No. 6531  
25 Expiration Date: 10/31/23

Kristen Streater, PH D

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1 I, KRISTEN STREATER, PH D , have read the  
2 foregoing deposition and hereby affix my  
3 signature that same is true and correct, except  
4 as noted above  
5  
6  
7  
8

9 Kristen Streater

10 KRISTEN STREATER, PH D

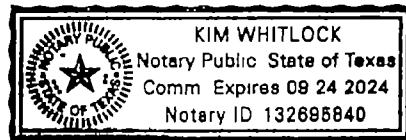
11  
12 THE STATE OF TEXAS,  
13 COUNTY OF COLLIN )

14 Subscribed and sworn to before me by the  
15 said witness, KRISTEN STREATER, PH D ,  
16

17 Given under my hand and seal of office  
18 this 30th day of MARCH, 20 23

19 Kim Whitlock  
20 Notary Public in and for the  
21 State of TEXAS

22 My commission expires 9/24/24



Kristen Streater, PH D

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## CHANGES AND SIGNATURE

PAGE LINE CHANGE REASON FOR CHANGE

Page 86, Line 6, add "or Contract Extension form" for clarification  
Page 90, Line 25, change "workdays" to "the Workday system" as correction  
and clarification

Kristen Streater, PH D

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A P P E A R A N C E S

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10 Also Present:

11 Joseph Michael Phillips

12 Monica Velazquez, Esquire - Collin College

13 Terry Vanderheyden, videographer  
14  
15  
16  
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**KTA**  
**KIM TINDALL & ASSOCIATES**

RE: Kristen Streater

April 3, 2023

Dear Client:

We are forwarding these documents to you as the custodial attorney in this matter. This transcript is being handled pursuant to the Federal Rules of Civil Procedure and we have copied all parties on the Changes and Signature page(s) with the attached Certificate of Deposition submitted by the deponent to our office.

The items marked refer to the attached documents.

✓ The Changes and Signature page(s) was returned to our office within the specified time limit; therefore, we are forwarding the original deposition transcript(s) and the Changes and Signature page(s) with the attached Certificate of Deposition to you as the custodial attorney in this matter for safekeeping. All parties will be copied on the Changes and Signature page(s).

\_\_\_\_\_ The deponent returned the Changes and Signature page(s) within the specified time limit, however, the Changes and Signature page(s) was inadvertently returned without the original transcript. All parties have been copied.

\_\_\_\_\_ The Changes and Signature page(s) was not returned to our office within the specified time limit; therefore, we are forwarding the original deposition transcript to you as the custodial attorney in this matter.

\_\_\_\_\_ The Changes and Signature page(s) was returned to our office unexecuted. We are forwarding the original deposition transcript to you as the custodial attorney in this matter.

\_\_\_\_\_ The deponent returned the Changes and Signature page(s) enclosed after the specified time limit. All parties have been copied as a courtesy.

\_\_\_\_\_ This is to notify you that the examination and signature was not requested by the deponent and/or a party before the completion of the deposition; therefore, signature is waived pursuant to the Federal Rules of Civil Procedures. All parties have been copied via e-mail.

\_\_\_\_\_ A copy of the Changes and Signature page(s) was previously returned within the specified time limit. We are now in receipt of the Original Deposition Transcript and/or Changes and Signature page(s); therefore, we are returning it to you as the Custodial attorney in this matter for safekeeping.

\_\_\_\_\_ Amended.

Should you have any questions or concerns, please feel free to contact our office.

Sincerely,

KTA Certs Department

[Certs@KTandA.COM](mailto:Certs@KTandA.COM)

Nancy Renfroe – Department Manager

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